

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**OLLIE GREENE, Individually as the
surviving parent of WYNDELL GREENE,
SR., WILLIAM GREENE, as the
Administrator of the Estate of WYNDELL
GREENE, SR., and MARILYN BURDETTE
HARDEMAN, Individually and as the
surviving parent of LAKEYSHA GREENE,**

Plaintiffs,

v.

**TOYOTA MOTOR CORPORATION,
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH AMERICA,
INC., TOYOTA MOTOR SALES USA,
INC., VOLVO GROUP NORTH
AMERICA, LLC., VOLVO TRUCKS
NORTH AMERICA, A DIVISION OF
VOLVO GROUP NORTH AMERICA,
LLC., STRICK TRAILERS, LLC, JOHN
FAYARD MOVING & WAREHOUSE,
LLC, and DOLPHIN LINE, INC.**

Defendants.

CAUSE NUMBER: 3:11-cv-0207-N

JURY TRIAL DEMANDED

PRESIDING JUDGE Hon. David Godbey	PLAINTIFF'S ATTORNEYS Aubrey "Nick" Pittman, Daryl K. Washington, Greg Marks, and Paul Stafford	DEFENDANTS' ATTORNEYS:
TRIAL DATE(S):	COURTROOM CLERK:	COURT REPORTER:

PLAINTIFFS' THIRD AMENDED EXHIBIT LIST

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
1.	Photo of Lakeysha Greene laying in the roadway				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
2.	Photo of Toyota SUV burning at accident site				
3.	Kaufman County Records Affidavit of 9-1-1 calls				
4.	Photo of Greene child charred remains				
5.	Photo2 of Greene child charred remains				
6.	Photo of wreckage and blood on roadway				
7.	Photo of charred remains being removed from Toyota 4Runner				
8.	Photo of rear of Toyota 4Runner at accident site				
9.	Photo of side of Toyota 4Runner at accident site				
10.	Photo of rear of Dolphin-Strick trailer at accident site				
11.	Photo of ICC Rear Impact Guard laying in roadway				
12.	Photo2 of ICC Rear Impact Guard laying in roadway				
13.	Intentionally Omitted				
14.	Photo of mud-flap on Dolphin Trailer at accident site				
15.	Close-up of photo2 of mud-flap on Dolphin Trailer at accident site				
16.	Photo of the Volvo tractor's front grill at accident site				
17.	Photo of front of Volvo truck at accident site				
18.	Intentionally Omitted				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
19.	Intentionally Omitted				
20.	Intentionally Omitted				
21.	Invoice for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.				
22.	Quotation for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.				
23.	Photo of rear of Strick Trailer after repair by Gulf City Body and Trailer Works, Inc.				
24.	Intentionally Omitted				
25.	Intentionally Omitted				
26.	Accident Report dated June 1, 2010, from Daniel Sprinkle of May 28, 2010, accident				
27.	Photos of rear of Strick trailer after accident - taken by John Fayard Moving				
28.	Fayard's Net Worth [CONFIDENTIAL]				
29.	April 6, 2010 Dolphin Repair Order				
30.	List of Trailers owned by Dolphin				
31.	Exemplar of Dolphin Broker Carrier Agreement, such as the one with Fayard Moving and Warehouse				
32.	Delivery receipt from RC Trailers for delivery of Strick Trailers to Dolphin				
33.	Financial statements of Dolphin Line Inc. [CONFIDENTIAL]				
34.	July 10, 2007 Dolphin Repair Order				
35.	February 29, 2008 Dolphin Repair Order				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
36.	July 2, 2008 Dolphin Repair Order				
37.	April 6, 2010 Dolphin Repair Order				
38.	Intentionally Omitted				
39.	Email from Todd Parks with deposition subjects for Strick designees and notification of production of exemplar trailer				
40.	Strick Invoice dated February 10, 2003 with RC Trailers				
41.	Strick Invoice with RC Trailers, signed by all				
42.	Strick Sales Order Specifications for RC Trailers Order				
43.	Press Release from Insurance Institute for Highway Safety – <i>Underride guards on big rigs fail in crashes; Institute petitions government for new standard</i>				
44.	Letter to NHTSA from Insurance Institute for Highway Safety re: petitioning the government for new standard for underride guards				
45.	<i>Underride Crashes</i> : Status Report from Insurance Institute for Highway Safety				
46.	April 14, 1993, memo from NHTSA regarding Rear Impact guards				
47.	Email among Strick officers regarding the Torcominian Patent's Underride Guard				
48.	Strick Trailer Care and Maintenance Manual				
49.	Strick Trailer Care and Maintenance Manual - Updated Dec 2011				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
50.	Strick's Manufacturer's Certification Label				
51.	Strick flyer – acknowledging that aftermarket and parts distributor is New Life Transport Parts Center				
52.	Strick's Dealers Names and Locations				
53.	Strick's Parts Nomenclature from New Life Transport Center				
54.	ICC Complete Assembly Orders				
55.	Strick Letter dated June 19, 1998 to customers to retrofit guards to new standards				
56.	Cost Bill of Materials for Rear of Strick Trailer				
57.	Photo1 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards				
58.	Photo2 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards				
59.	Photo3 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards				
60.	Strick diagram showing an ICC guard with rounded end				
61.	Canadian Motor Vehicle 223 Standards effective 2005				
62.	List of Underride cases in which Strick has been involved				
63.	Strick Record Retention Policy				
64.	April 6, 2012 Supplemental Discovery Request to Strick				
65.	Strick Balance Sheet [CONFIDENTIAL]				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
66.	Canadian Motor Vehicle 223 Test Methods dated 2003				
67.	Strick 1995 Rear Impact Guard Testing Report				
68.	Karco Testing Report for Strick Trailers submitted to NHTSA 1999				
69.	Texas Peace Officer's Report prepared by Trooper Barkley				
70.	Excerpt from Texas Peace Officer's Report prepared by Trooper Clint Baughman				
71.	Excerpt2 from Texas Peace Officer's Report prepared by Trooper Clint Baughman				
72.	Annual Vehicle Inspection Report for Dolphin Tractor				
73.	Crash Investigation Report from Texas Peace Officer's Report prepared by Trooper Clint Baughman regarding John Fayard Moving & Storage				
74.	Supplemental Investigation report with information obtained from Trooper Barclay				
75.	Intentionally Omitted				
76.	Intentionally Omitted				
77.	Intentionally Omitted				
78.	IIHS Status Report dated April 17, 2008 re: Crash Avoidance Technologies				
79.	Intentionally Omitted				
80.	Intentionally Omitted				
81.	Intentionally Omitted				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
82.	National Transportation Safety Board Special Investigative Report - Prevention of Rear end collisions				
83.	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies				
84.	National Transportation Safety Board's investigation of Truck-Tractor Semitrailer Rear-end Collision into Passenger Vehicles on Interstate 44 Near Miami, Oklahoma June 26, 2009				
85.	Intentionally Omitted				
86.	Intentionally Omitted				
87.	Intentionally Omitted				
88.	Intentionally Omitted				
89.	Intentionally Omitted				
90.	Intentionally Omitted				
91.	Intentionally Omitted				
92.	Intentionally Omitted				
93.	NHTSA's Vehicle Compatibility Research Program				
94.	Intentionally Omitted				
95.	Intentionally Omitted				
96.	Intentionally Omitted				
97.	Intentionally Omitted				
98.	Intentionally Omitted				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
99.	Intentionally Omitted				
100.	Intentionally Omitted				
101.	Intentionally Omitted				
102.	Intentionally Omitted				
103.	Intentionally Omitted				
104.	Intentionally Omitted				
105.	Photo of Volvo truck at accident site (passenger side view)				
106.	Photo of Volvo truck at accident site (front end view)				
107.	Photo of Volvo truck at accident site (showing front end and grill)				
108.	Intentionally Omitted				
109.	Intentionally Omitted				
110.	Intentionally Omitted				
111.	Intentionally Omitted				
112.	Photo of remaining parts of Volvo tractor bumper taken at inspection				
113.	Intentionally Omitted				
114.	Intentionally Omitted				
115.	Intentionally Omitted				
116.	Intentionally Omitted				
117.	Article - <i>First Order Analysis for Automotive Body Structure Design</i>				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
118.	Article - <i>Application of Crash Simulation to Vehicle Development</i>				
119.	Passive Safety - Toyota's use of CAE and FEM				
120.	Document Retention Policy for Toyota Motor Corporation				
121.	<i>The Study of the Frontal Compatibility of Consideration of Interaction and Stiffness</i>				
122.	THUMS Total HUMAN Model for Safety article				
123.	THUMS Total HUMAN Model for Safety 2011 article				
124.	Simulation of Occupant Motion in Rear Impacts using Human FE Model THUMS				
125.	Intentionally Omitted				
126.	Letter dated March 4, 1992 from Saburo Inui to NHTSA discussing FMVSS 210 and manufacturer's freedom on designs				
127.	Photograph of undercarriage of 2010 Toyota 4Runner prepared for NCAP testing				
128.	Photo of undercarriage of Toyota 4Runner Trail model (from Toyota Brochure)				
129.	Narrative of Fuel System from Toyota 4Runner Brochure				
130.	Narrative and diagram of Fuel Tank components (from Toyota 4Runner Brochure)				
131.	Letter dated March 5, 1993 from Saburo Inui to NHTSA discussing FMVSS 301 and standards for testing tanks				

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132.	Narrative and diagram of SRS airbags (from 2010 Toyota Brochure)				
133.	Toyota press release of recall of RAV4 and Highlander vehicles to replace curtain shield airbag sensor assembly				
134.	Toyota press release of recall of 2011 RAV4 vehicles to replace curtain shield airbag initiator assembly				
135.	Picture showing the burning Toyota 4Runner				
136.	Intentionally Omitted				
137.	Toyota Motor Sales' Document Retention Policy				
138.	Toyota 4Runner Ad (<i>No Intelligent Life Out There</i>)				
139.	Toyota 4Runner ad (<i>Rise Above Ordinary</i>)				
140.	Website advertising of Toyota 4Runner				
141.	September 24, 2009, Press Release announcing launch of 2010 4Runner				
142.	Internet article of Press Release regarding debut of Toyota 4Runner in Dallas				
143.	Sales brochure for 2011 4Runner				
144.	Sales brochure for 2010 4Runner				
145.	Toyota Pocket Source Brochure for 2010 4Runner				
146.	Intentionally Omitted				
147.	Copy of Toyota advertisement (spending a million dollars per hour)				

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148.	Toyota 4Runner ad (Star Safety)				
149.	Toyota 2010 Organizational Chart				
150.	Toyota Press Release of recall of selected Lexus models				
151.	Toyota Press Release of recall of 4Runners and other vehicle in Southeast Region for Seat Occupant Sensing System				
152.	Toyota Press Release of recall of certain vehicles for passenger airbag inflator problems				
153.	Manufacturers Motor Vehicle Specifications for 2010 4Runner				
154.	Toyota 4Runner Owners Warranty Rights Notification				
155.	Main Vehicle Inquiry showing logistics and building of the Greene 4Runner				
156.	Service Serial Master Inquiry for Greene 4Runner				
157.	Texas Dept. of Motor Vehicle history for the Greene 4Runner				
158.	Monroney Label (Sticker Label) for Greene 4Runner				
159.	Toyota Organizational Chart for 2013				
160.	Mills Accident Report				
161.	Diab Accident Report				
162.	Baker Accident Report				
163.	Puga Accident Report				

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164.	Schiller Accident Report				
165.	Snelgrove Accident Report				
166.	Photo of accident site (Exhibit 1 from Brian Thompson Deposition)				
167.	Recall letter from NHTSA dated June 25, 2010 of 2010 Lexus HS for noncompliance with FMVSS 301				
168.	Toyota's July 27, 2010 letter to NHTSA responding to recall notice re 2010 Lexus HS for noncompliance with FMVSS 301				
169.	Scale diagram of accident scene received from Texas Highway Patrol Division				
170.	Information regarding Stop-Sale Order on Toyota Automobiles from U.S., Canada over Flammable Seat Fabric				
171.	Intentionally Omitted				
172.	Intentionally Omitted				
173.	Intentionally Omitted				
174.	NHTSA Publication - Traffic Safety Facts 2006 Data (bates no. GREENE_006711-15)				
175.	Toyota Press Release confirming more than 2.2 million vehicles sold in U.S. in 2008.				
176.	Announcement: Toyota Launches New Product Leadership Campaign with its agency Saatchi & Saatchi.				
177.	Ad with mom holding a baby - No matter who you are or what you drive, everyone deserves to be safe				

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178.	Ad from front page of Yahoo, shown nationwide, depicting a woman holding a baby and figures of a family of four and the slogan "Everyone deserves safety."				
179.	Ad depicting minorities standing behind Toyota's "everyone deserves to be safe" claim.				
180.	National ad portraying actor (or employee) who is represented to be a female Automotive Engineer with Toyota.				
181.	National ad portraying actor (or employee) who is represented to be a minority male Automotive Engineer at Toyota.				
182.	National ad portraying actor (or employee) who is represented to be the Chief Engineer at Toyota.				
183.	National ad alleging that Toyota has set up "Smart Teams," comprising "200 highly trained engineers and technical experts."				
184.	National ad alleging that Toyota has set up "Smart Teams," includes an endorsement from Toyota's "Chief Quality Officer,"				
185.	Toyota T.V. ad depicting a couple, and announcing that Toyota is recognized for being safe.				
186.	Toyota T.V. ad depicting small children, and announcing that Toyota is recognized for being safe.				
187.	Toyota T.V. ad depicting a family of four, and announcing that Toyota is recognized for being safe.				

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188.	Toyota T.V. ad depicting an African-American family with kids, and announcing that Toyota is recognized for being safe.				
189.	Toyota T.V. ad with a tagline announcing that Toyota is recognized for being safe.				
190.	Toyota T.V. ad with a tagline announcing that “no other brand has won more (safety awards).”				
191.	National ad - spending \$1 million an hour on safety is displayed prominently on the commercial.				
192.	Rollover Ratings for Midsize SUV’s prepared by Insurance Institute for Highway Safety, Highway Loss Data Institute.				
193.	February 24, 2010, testimony of Toyota’s CEO, Akio Toyoda, before the U.S. House Committee on Oversight and Government Reform.				
194.	February 9, 2010 Op-Ed in the Washington Post written by Toyota’s CEO, Akio Toyoda.				
195.	Press Release: Toyota paid \$1.6 billion to settle claims related to certain recalls.				
196.	Press release: Toyota paid a record \$16.4 million fine to the U.S. government for failing to quickly report safety problems.				
197.	Toyota recall in 2010 of thousands of the 2010 Lexus HS 250h due to deadly fuel leaks after collisions				
198.	Toyota recall of the Lexus GS, IS 250 and IS 350 models in the United States due to potential cracks in fuel pipes.				

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199.	Toyota recall of 2009-2012 4Runners, Sequoias, and other vehicles because Toyota failed to test the passenger seat occupant sensing system calibration.				
200.	Toyota recall of hundreds of thousands of RAV4 and Highlander SUVs due to defective curtain shield airbags.				
201.	Toyota recall of more RAV4 and Highlander SUV models for defective side curtain shield airbags.				
202.	Toyota recalls Corolla, Sequoia, Tundra vehicles for defective airbag inflators.				
203.	Toyota press releases confirming that Toyota has had over thirty-five (35) recalls over the last 2-3 years on all of its models for various safety issues.				
204.	Toyota ad depicting that the 4Runner is used off-road.				
205.	Toyota ad depicting the 4Runner being used for racing.				
206.	Toyota ad - 4Runner has maximum ground clearance.				
207.	Toyota ad of the undercarriage of 2010 Toyota 4Runner 4x4 version - bates SSTSUB13-00166				
208.	Toyota d stating that the 4Runner can “take on any road to anywhere.”				
209.	Toyota advertised the 4Runner as “one of the most trustworthy vehicles on the road.”				

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210.	2010 article noting that Toyota's safety campaign was being blitzed all over the country on virtually every network.				
211.	Advertisement for Toyota 4Runner - "take daily nonstop to the middle of nowhere...then return home to tell us about it thanks to the Star Safety System."				
212.	Official Justice Department Press Release Announcing Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty				
213.	Official Justice Department Deferred Prosecution Agreement regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty				
214.	Official Justice Department Statement of Facts regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty				
215.	Toyota Automotive Safety Manual – Bates number 86845-86892				
216.	Slideshow presentation (first 10 pages) – http://www.sc.toyotafinancial.com/web/tfs/pub/contents/investorRelations/Investor%20Presentation%20April%202013.pdf				
217.	Letter dated June 14, 2010 from Toyota Financial Services regarding amount to be paid to Toyota as a result of the loss of the 4Runner				
218.	Toyota's Annual Report (Form 20-F) for 2010, pursuant to Section 13 of the SEC Act of 1934 (bate-numbers 847962-848163)				
219.	Intentionally Omitted				

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220.	Intentionally Omitted				
221.	Intentionally Omitted				
222.	Intentionally Omitted				
223.	Intentionally Omitted				
224.	Intentionally Omitted				
225.	Intentionally Omitted				
226.	Intentionally Omitted				
227.	Intentionally Omitted				
228.	Intentionally Omitted				
229.	NHTSA's 2012 Vehicle Recalls by Manufacturer				
230.	Intentionally Omitted				
231.	Intentionally Omitted				
232.	Intentionally Omitted				
233.	Intentionally Omitted				
234.	Intentionally Omitted				
235.	Intentionally Omitted				
236.	Intentionally Omitted				
237.	Intentionally Omitted				
238.	Intentionally Omitted				
239.	Intentionally Omitted				
240.	Intentionally Omitted				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
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241.	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies				
242.	Intentionally Omitted				
243.	Intentionally Omitted				
244.	Photo of rear of Dolphin-Strick trailer - GREENE_002101				
245.	Photo of underside of Dolphin-Strick trailer - GREENE_002238				
246.	Information from Strick's membership group and NHTSA regarding potential costs and benefits of underride guards				
247.	Strick Trailer's February 2, 1998 Testing Report for "16" Weld-on Bumper Gusset"				
248.	Department of Public Safety Photos (bates no. Toyota 00007-00080)				
249.	WFAA News scene photograph (bates no. Toyota_00131)				
250.	Autopsy of Lakeysha Greene				
251.	Autopsy of Wyndell Greene, Sr.				
252.	Recording of Kaufman County 9-1-1 call: 025_2010_05_28_182454699 (confirmed by Plaintiffs' Ex. 3)				
253.	Recording of Kaufman County 9-1-1 call: 022_2010_05_28_182454261(confirmed by Plaintiffs' Ex. 3)				
254.	Recording of Kaufman County 9-1-1 call: 005_2010_05_28_183041417(confirmed by Plaintiffs' Ex. 3)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
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255.	Recording of Kaufman County 9-1-1 call DISPATCHING Elmo Fire and Rescue: 023_2010_05_28_182733167(confirmed by Plaintiffs' Ex. 3)				
256.	Affidavit of Texas Department of Transportation Crash Report				
257.	Affidavit of Billing of Reasonable and Necessary Medical Expenses from UT Southwestern Medical Center (bates no. GREENE_006442-006467)				
258.	Medical Examiner's tagged photographs of Wyndell Greene, Sr. (with private parts redacted) (bates no. GREENE_006468-006470)				
259.	Medical Expenses from Air Evac Lifeteam to transport Wyndell Greene, Sr. on May 28, 2010				
260.	Affidavit of medical records from Air Evac Lifeteam for Wyndell Greene, Sr. on May 28, 2010 (bates no. GREENE_000125-000137)				
261.	Medical Expenses from Centennial Medical Center				
262.	Photos at accident site (bates no. GREENE_000400-000407)				
263.	Dairy entries in Caring Bridge journal (bates no. GREENE_000432-000453)				
264.	Affidavit of Billing of Reasonable and Necessary Medical Expenses from Parkland Hospital (bates no. GREENE_002820-003115)				
265.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 1 of 8)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
266.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 2 of 8)				
267.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 3 of 8)				
268.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 4 of 8)				
269.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 5 of 8)				
270.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 6 of 8)				
271.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 7 of 8)				
272.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 8 of 8)				
273.	Summary of Wyndell Greene medical expenses paid by Meridian Resource on behalf of Lakeysha Greene				
274.	ETMC EMS Patient Care Records for Wyndell Greene on May 28, 2010				
275.	Dairy entries in Caring Bridge journal (bates no. GREENE_002494-002726)				
276.	Lakeysha and Wyndell Greene wedding photo				
277.	Photo of Wesleigh Greene at birth				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
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278.	Photo of Wesleigh Greene with her father as he works				
279.	Photo of Wesleigh Greene at 1 st birthday party				
280.	Photo of Wyndell Greene, Sr. teaching Wesleigh to swim				
281.	Wesleigh Greene's writings and drawings to her mother				
282.	Wesleigh Greene's writings and drawings to her mother and father				
283.	Wyndell Greene, Sr. and Wesleigh Greene at Daughter-Daddy dance				
284.	Photo of Wesleigh Greene dressed for birthday party				
285.	Photo of Wyndell Greene, II at childbirth				
286.	Photo of Wyndell "Kyle" Greene, II				
287.	Photo of Wesleigh Greene				
288.	Photo of Wesleigh and Kyle Greene				
289.	Short video of Wesleigh Greene				
290.	Short video of Wyndell Kyle Greene, II				
291.	Greene Family Photo				
292.	Photo of Wesleigh Greene and teacher				
293.	Wesleigh Greene and classmates				
294.	Greene Family Photo				
295.	Greene Family Photo				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
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296.	Photo of Mrs. Marilyn Hardeman and grandkids				
297.	Photo of Mrs. Ollie Greene and Wesleigh				
298.	Memorial Service video for Lakeysha, Wesleigh, and Wyndell Greene, II (bates no. GREENE_006435)				
299.	Printed Memorial Service Program for Lakeysha, Wesleigh, and Wyndell Greene, II				
300.	Video portrait of the Greene family (bates no. GREENE_006716)				
301.	Video of balloon send-off for Wesleigh Greene from classmates (bates no. GREENE_000455)				
302.	Funeral expenses for Lakeysha, Wesleigh, and Kyle funeral				
303.	Photo of gravestone for Lakeysha, Kyle and Wesleigh Greene				
304.	Wyndell Greene's funeral program				
305.	Video 1 of interior and exterior of the Greene residence				
306.	Video 2 of interior and exterior of the Greene residence				
307.	Timeline of critical dates				
308.	Dr. Darrell Henderson's Expert Report				
309.	Curriculum Vitae and testimony list for Dr. Darrell Henderson				
310.	Photo1 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
311.	Photo2 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
312.	Photo3 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
313.	Photo4 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
314.	Photo5 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
315.	Photo6 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
316.	Photo7 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
317.	Photo8 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
318.	Photo9 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
319.	Skin and Burn Illustrations_0001				
320.	Skin and Burn Illustrations_0002				
321.	Skin and Burn Illustrations_0003				
322.	Skin and Burn Illustrations_0004				
323.	Intentionally Omitted				
324.	Intentionally Omitted				
325.	Expert report of Dr. Trudi Zaplac				
326.	Curriculum Vitae of Dr. Trudi Zaplac				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
327.	Expert report of Dr. Stan Smith				
328.	Curriculum Vitae of Dr. Stan Smith and list of cases				
329.	Wyndell and Lakeysha Greene Tax Returns 2005-2010				
330.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 1 OF 2				
331.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 2 OF 2				
332.	Wyndell Greene payroll records - Merrill Lynch				
333.	Lakeysha Greene payroll records – Accenture, Vol 1 of 3				
334.	Lakeysha Greene payroll records – Accenture, Vol 2 of 3				
335.	Lakeysha Greene payroll records – Accenture, Vol 3 of 3				
336.	Lakeysha Greene payroll records - PepsiCo				
337.	Expert report of Jeff Vick				
338.	Curriculum Vitae of Jeff Vick				
339.	On-Site Photo DSC07094				
340.	On-Site Photo DSC07096				
341.	On-Site Photos DSC07102 and DSC07123				
342.	On-Site Photos DSC07104 and DSC07128				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
343.	On-Site Photo DSC07105 and DSC07129				
344.	On-Site Photo DSC07106 and DSC 07130				
345.	On-Site Photo DSC07107 and DSC07136				
346.	On-Site Photo DSC07111				
347.	On-Site Photo DSC07114				
348.	On-Site Photo DSC07116				
349.	On-Site Photo DSC07118				
350.	On-Site Photo DSC07122				
351.	On-Site Aerial Photo MG_6717_4000				
352.	On-Site Photo of accident fire				
353.	On-Site Photo1 of vehicles at rest				
354.	On-Site Photo2 of vehicles at rest				
355.	On-Site Photo3 of vehicles at rest				
356.	On-Site Photo4 of vehicles at rest				
357.	On-Site Photo5 of vehicles at rest				
358.	On-Site Photo6 of vehicles at rest				
359.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01038				
360.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01039				
361.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01042				
362.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01043				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
363.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01045				
364.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01046				
365.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01047				
366.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01051				
367.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01053				
368.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01055				
369.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01056				
370.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01057				
371.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01059				
372.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01060				
373.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01063				
374.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01064				
375.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01065				
376.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01068				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
377.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01069				
378.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01070				
379.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01072				
380.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01073				
381.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01074				
382.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01075				
383.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01076				
384.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01077				
385.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01083				
386.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01084				
387.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01099				
388.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01101				
389.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01102				
390.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01103				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
391.	Toyota 4Runner Photo DSC06488				
392.	Toyota 4Runner Photo DSC06489				
393.	Toyota 4Runner Photo DSC07419				
394.	Toyota 4Runner Photo DSC07420				
395.	Toyota 4Runner Photo DSC07421				
396.	Toyota 4Runner Photo DSC07422				
397.	Toyota 4Runner Photo DSC07423				
398.	Toyota 4Runner Photo DSC07424				
399.	Toyota 4Runner Photo DSC07426				
400.	Toyota 4Runner Photo DSC07427				
401.	Toyota 4Runner Photo DSC07428				
402.	Toyota 4Runner Photo DSC07434				
403.	Toyota 4Runner Photo DSC07435				
404.	Toyota 4Runner Photo DSC07436				
405.	Toyota 4Runner Photo DSC07437				
406.	Toyota 4Runner Photo DSC07438				
407.	Toyota 4Runner Photo DSC07456				
408.	Toyota 4Runner Photo DSC07457				
409.	Toyota Corolla Photo DSC07468				
410.	Toyota 4Runner Photo DSC07470				
411.	Toyota 4Runner Photo DSC07634				
412.	Toyota Corolla Photo DSC07550				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
413.	Toyota Corolla Photo DSC07551				
414.	Toyota Corolla Photo DSC07552				
415.	Toyota Corolla Photo DSC07553				
416.	Toyota Corolla Photo DSC07554				
417.	Toyota Corolla Photo DSC07562				
418.	Toyota Corolla Photo DSC07568				
419.	Toyota Corolla Photo DSC07583				
420.	Toyota Corolla Photo DSC07586				
421.	Toyota Corolla Photo DSC07595				
422.	Toyota Corolla Photo DSC07597				
423.	Toyota Corolla Photo DSC07604				
424.	Toyota Corolla Photo DSC07611				
425.	Toyota Corolla Photo DSC07655				
426.	Toyota Corolla Photo DSC07656				
427.	Toyota Corolla Photo DSC07662				
428.	Toyota Corolla Photo DSC07663				
429.	Volvo VN Tractor Photo DSC07261				
430.	Volvo VN Tractor Photo DSC07263				
431.	Volvo VN Tractor Photo DSC07264				
432.	Volvo VN Tractor Photo DSC07266				
433.	Volvo VN Tractor Photo DSC07357				
434.	Volvo VN Tractor Photo DSC07358				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
435.	Volvo VN Tractor Photo DSC07360				
436.	Volvo VN Tractor Photo DSC07381				
437.	Two photos of Volvo VN tractor at tow yard (bates no. GREENE_006505-06)				
438.	Photo of Fayard Freightliner tractor (bates no. GREENE_001123)				
439.	Photo of Fayard Freightliner tractor (bates no. GREENE_001124)				
440.	Photo of Fayard Freightliner tractor (bates no. GREENE_001213)				
441.	Photo of Fayard Freightliner tractor (bates no. GREENE_001224)				
442.	Photo of Fayard Freightliner tractor (bates no. GREENE_001226)				
443.	Photo of Fayard Freightliner tractor (bates no. GREENE_001231)				
444.	Photo of Fayard Freightliner tractor (bates no. GREENE_001232)				
445.	Photo of Fayard Freightliner tractor (bates no. GREENE_001233)				
446.	Photo of Fayard Freightliner tractor (bates no. GREENE_001236)				
447.	Photo of Fayard Freightliner tractor (bates no. GREENE_001240)				
448.	Photo of Fayard Freightliner tractor (bates no. GREENE_001242)				
449.	Photo of Fayard Freightliner tractor (bates no. GREENE_001243)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
450.	Photo of Fayard Freightliner tractor (bates no. GREENE_001245)				
451.	Photo of Fayard Freightliner tractor (bates no. GREENE_001246)				
452.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001273)				
453.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001274)				
454.	VinLink VIN information for Toyota 4Runner				
455.	VinLink VIN information for Toyota Corolla				
456.	2006 TOYOTA COROLLA 4 DOOR SEDAN AutoStats				
457.	2010 TOYOTA 4RUNNER 4 DOOR 4X2 UTILITY AutoStats				
458.	StifCalc Rear Impact Test Summary Report				
459.	StifCalc Rear Impact Test Summary Report-Utility vehicles				
460.	Equations and Calculations from Jeff Vick				
461.	Volvo Point of Perception - diagram				
462.	Volvo Braking Begins - diagram				
463.	Volvo 4 Runner Impact - diagram				
464.	4 Runner Corolla Impact - diagram				
465.	Volvo 4 Runner Corolla impact - diagram				
466.	4 Runner Volvo Separation - diagram				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
467.	4 Runner Strick Trailer Impact - diagram				
468.	Strick Trailer Impact - diagram				
469.	Tool Box Impact - diagram				
470.	Vehicle Final Rest Position - diagram				
471.	Texas Dept. of Public Safety - Highway Patrol Officer Measurements				
472.	Friedman Research Expert Report - Toyota				
473.	Intentionally Omitted				
474.	Friedman Research Expert Report - Strick				
475.	Friedman Research Expert Report – Fayard and Dolphin				
476.	Curriculum Vitae of Keith Friedman				
477.	Curriculum Vitae of Dr. R. Rhodes Stephenson				
478.	Fire bibliography – marked as Exhibit 6 to Dr. Stephenson deposition				
479.	Supplemental bibliography (marked as Exhibit 7 to Dr. Stephenson’s deposition”				
480.	Additional research considered (marked as Exhibit 8 to Dr. Stephenson’s deposition)				
481.	Toyota ad directed towards consumers in Mr. Greene’s demographic				
482.	The 2010 Toyota 4Runner				
483.	Exemplar of fuel tank from 2010 Toyota 4Runner				
484.	Photo of dislodged underride guard (bates no. GREENE_000903)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
485.	Photo of dislodged underride guard (bates no. GREENE_000904)				
486.	2010 Toyota 4Runner LF Quarter Panel Comparison between Replacement and Incident Vehicle				
487.	Comparison tank crush - Photo of end of tank to end of shield				
488.	Photos of Greene fuel tank damage and impacts from accident				
489.	photo of identification of 4Runner roof replacement				
490.	photo of impact of area of 4Runner with trailer				
491.	Photos of underride guard at accident scene				
492.	Photo of Greene vehicle at accident scene				
493.	Photos of examples of underride mountings				
494.	Photos of example in use underride guard				
495.	Repair quote of accident trailer arranged by Fayard				
496.	Bates# Dolphin-0320 - Annual Vehicle Inspection Report for Dolphin Line Vehicle dated 5-6-2009				
497.	Photos of underride guards that Fayard installed on the Strick trailer				
498.	Violations discovered by TXPDS Commercial Vehicle Enforcement (TX10440EAQ01, CD# 0798253, 5/28/2010				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
499.	Documents included with purchase of Strick authorized parts - no instructions				
500.	Photo of Strick part, with label				
501.	Photo of Strick underride guard as received				
502.	Photo of Strick underride guard test				
503.	Underride guard P3 test results				
504.	Photo illustrations of underride guard designs that are welded to cross tube				
505.	Comparison illustrations of underride guards				
506.	Illustration of Strick tested version of underride guard had bolts on the top bracket				
507.	Document - Strick bill of materials that proves they knew trailer was for Dolphin Line (customer)				
508.	Photos of scratch marks on incident Toyota 4Runner on pavement and partial shield				
509.	Photos of Volvo front end and flexible bumper fascia that fell off				
510.	Figure - Comparison of FMVSS Stopping Distance Requirements from 60 mph				
511.	Intentionally Omitted				
512.	Excerpt of FE modeling from Toyota Bates 754674-754682				
513.	Excerpt of FE modeling from Toyota Bates 754683-754688				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
514.	Excerpt of FE modeling from Toyota Bates 754689-754697				
515.	Passive Safety - Finite Element Modeling				
516.	Excerpt of FE modeling of Toyota partial body				
517.	Excerpt of FE modeling of Toyota 4Runner				
518.	2010 vs 2014 Toyota 4Runner rear portion comparison				
519.	Photo of 2010 Toyota 4Runner fuel tank distance to rear axle				
520.	Comparison illustrations 2010 Toyota 4Runner with fuel tank				
521.	Toyota frame, tank, body deformation illustration				
522.	2010 Toyota 4Runner fuel tank with labels and test results				
523.	Photo - side view of driver rear frame - incident 2010 Toyota 4Runner				
524.	Photo from Toyota Rav4				
525.	Alternative design of fuel tank placement				
526.	Alternative frame design and fuel tank placement				
527.	Check valve illustrations				
528.	Illustration of fuel tanks Toyota vehicles - 1994 4Runner, 2008 Rav4, 2008 Sequoia				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
529.	Illustration of fuel tank - 2006 Toyota 4Runner				
530.	Test Results and comparison of 2010 Toyota 4Runner with other vehicle fuel system designs				
531.	Exhibit 12 from Keith Friedman Deposition				
532.	Illustrations of leak testing, accident scene information, and vehicle characteristics				
533.	Illustrations related to Strick underride guard, including photos of components and scene photos				
534.	Illustrations of Toyota 4Runner exemplar fuel system components				
535.	Illustrations of Toyota parts and Strick trailer				
536.	Illustrations related to Strick underride guard, including subject trailer and installation instructions				
537.	illustrations of Strick Toyota and Volvo parts and concepts				
538.	Illustration of 2003 Strick welded underride guard				
539.	Illustration of Toyota part and trailer				
540.	illustration of Toyota 4runners				
541.	illustration of Toyota parts (fuel tank, tank strap and shield)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
542.	illustration of alternative frame designs				
543.	Illustration of Volvo tractor frame and parts				
544.	Illustration of accident vehicle parts				
545.	Illustration of Toyota Fuel Tank Skid Plate Underside Striations				
546.	Illustration of various fuel tanks				
547.	Illustration of Toyota shield				
548.	Illustration of seat belt usage				
549.	Illustration of accident vehicle fuel tank damage				
550.	Illustration of accident vehicle damage				
551.	Illustration of accident vehicle damage (Rear Axle Bracket and Stabilizer Link Impact with Rear of Muffler)				
552.	Illustration of rear axle forward motion				
553.	Illustration of strap bending and rear fuel tank deformation				
554.	Illustration of fuel tank bending and other vehicle damage				
555.	Visual comparison of 2010 and 2014 4Runners				
556.	Illustration of locations of fuel tanks by other manufacturers				
557.	Radar collision mitigation scenarios (Ex. 26 at Friedman Deposition)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
558.	Illustration of vehicle damage to 4Runner and Strick trailer				
559.	Illustration of replacement Strick underride guards				
560.	Illustration of vehicle damage, scene, parts				
561.	Illustration of Toyota parts				
562.	Illustration of Toyota parts				
563.	Illustration of Toyota parts				
564.	Illustration of Toyota parts				
565.	Illustration of Toyota parts				
566.	Illustration of Toyota parts				
567.	Illustration of Toyota parts				
568.	Illustration of Toyota parts				
569.	Illustration of Toyota parts				
570.	Demonstrative video – 4Runner into Strick Trailer				
571.	Demonstrative video – 4Runner into Strick Trailer				
572.	Demonstrative video – 4Runner into Strick Trailer				
573.	Demonstrative video – 4Runner into Strick Trailer				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
574.	Demonstrative video – 4Runner into Strick Trailer				
575.	Demonstrative video – 4Runner component parts				
576.	Demonstrative video – 4Runner component parts				
577.	Demonstrative video – 4Runner into Strick Trailer				
578.	Demonstrative video – Heavy Truck into 4Runner				
579.	Demonstrative video – Heavy Truck into 4Runner				
580.	Demonstrative video – Heavy Truck into 4Runner				
581.	Demonstrative video – Heavy Truck into 4Runner				
582.	Demonstrative video – 4Runner into Strick Trailer				
583.	Demonstrative video – 4Runner into Strick Trailer				
584.	Demonstrative video – 4Runner into Strick Trailer				
585.	Demonstrative video – 4Runner into Strick Trailer				
586.	Demonstrative video – 4Runner into Strick Trailer				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
587.	Demonstrative video – 4Runner into Strick Trailer				
588.	Demonstrative video – 4Runner into Strick Trailer				
589.	Demonstrative video – Heavy Truck into 4Runner				
590.	Demonstrative video – Heavy Truck into 4Runner				
591.	Demonstrative video – Heavy Truck into 4Runner				
592.	Demonstrative video – Heavy Truck into 4Runner				
593.	Demonstrative video – 4Runner component parts				
594.	Demonstrative video – 4Runner component parts				
595.	Demonstrative video – Heavy Truck into 4Runner				
596.	Demonstrative video – Heavy Truck into 4Runner				
597.	Demonstrative video – 4Runner component parts				
598.	Demonstrative video – Heavy Truck into 4Runner				
599.	Demonstrative video – Heavy Truck into 4Runner				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
600.	Demonstrative video – 4Runner component parts				
601.	Demonstrative video – Heavy Truck into 4Runner				
602.	Demonstrative video – Heavy Truck into 4Runner				
603.	Demonstrative video – Heavy Truck into 4Runner				
604.	Demonstrative video – 4Runner into Strick Trailer				
605.	Demonstrative video – 4Runner into Strick Trailer				
606.	Demonstrative video – 4Runner into Strick Trailer				
607.	Demonstrative video – 4Runner into Strick Trailer				
608.	Demonstrative video – Heavy Truck into 4Runner				
609.	Demonstrative video – Heavy Truck into 4Runner				
610.	Demonstrative video – Heavy Truck into 4Runner				
611.	Demonstrative video – Heavy Truck into 4Runner				
612.	Demonstrative video – 4Runner into Strick Trailer				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
613.	Demonstrative video – 4Runner into Strick Trailer				
614.	Demonstrative video – 4Runner into Strick Trailer				
615.	Demonstrative video – 4Runner into Strick Trailer				
616.	Demonstrative video – 4Runner into Strick Trailer				
617.	Demonstrative video – 4Runner into Strick Trailer				
618.	Demonstrative video – 4Runner into Strick Trailer				
619.	Demonstrative video – 4Runner into Strick Trailer				
620.	Demonstrative video – 4Runner into Strick Trailer				
621.	Demonstrative video – 4Runner into Strick Trailer				
622.	Demonstrative video – 4Runner into Strick Trailer				
623.	Demonstrative video – 4Runner into Strick Trailer				
624.	Demonstrative video – 4Runner into Strick Trailer				
625.	Demonstrative video – 4Runner into Strick Trailer				
626.	Demonstrative video – 4Runner into Strick Trailer				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
627.	Demonstrative video – 4Runner fuel system design				
628.	Demonstrative video – 4Runner fuel system design				
629.	Demonstrative video – 4Runner into Strick Trailer				
630.	Demonstrative video – 4Runner into Strick Trailer				
631.	Demonstrative video – 4Runner into Strick Trailer				
632.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged				
633.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged				
634.	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged				
635.	Demonstrative video – 4Runner into Strick Trailer				
636.	Demonstrative video – psi fill for fuel tank				
637.	Demonstrative video – fuel tank leak video				
638.	Demonstrative video – IIHS crash test				
639.	Demonstrative video – IIHS crash test				
640.	Friedman/Stephenson Analysis of Evidence Photo 9				
641.	Friedman/Stephenson Analysis of Evidence Photo 10				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
642.	Friedman/Stephenson Analysis of Evidence Photo 11				
643.	Friedman/Stephenson Analysis of Evidence Photo 12				
644.	Friedman/Stephenson Analysis of Evidence Photo 13				
645.	Friedman/Stephenson Analysis of Evidence Photo 14				
646.	Friedman/Stephenson Analysis of Evidence Photo 15				
647.	Friedman/Stephenson Analysis of Evidence Photo 16				
648.	Friedman/Stephenson Analysis of Evidence Photo 17				
649.	Friedman/Stephenson Analysis of Evidence Photo 18				
650.	Friedman/Stephenson Analysis of Evidence Photo 19				
651.	Friedman/Stephenson Analysis of Evidence Photo 20				
652.	Friedman/Stephenson Analysis of Evidence Photo 21				
653.	Friedman/Stephenson Analysis of Evidence Photo 22				
654.	Friedman/Stephenson Analysis of Evidence Photo 23				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
655.	Friedman/Stephenson Analysis of Evidence Photo 24				
656.	Friedman/Stephenson Analysis of Evidence Photo 25				
657.	Friedman/Stephenson Analysis of Evidence Photo 26				
658.	Friedman/Stephenson Analysis of Evidence Photo 27				
659.	Friedman/Stephenson Analysis of Evidence Photo 28				
660.	Friedman/Stephenson Analysis of Evidence Photo 29				
661.	Friedman/Stephenson Analysis of Evidence Photo 30				
662.	Friedman/Stephenson Analysis of Evidence Photo 31				
663.	Friedman/Stephenson Analysis of Evidence Photo 32				
664.	Friedman/Stephenson Analysis of Evidence Photo 33				
665.	Friedman/Stephenson Analysis of Evidence Photo 34				
666.	Friedman/Stephenson Analysis of Evidence Photo 35				
667.	Friedman/Stephenson Analysis of Evidence Photo 36				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
668.	Friedman/Stephenson Analysis of Evidence Photo 37				
669.	Friedman/Stephenson Analysis of Evidence Photo 38				
670.	Friedman/Stephenson Analysis of Evidence Photo 39				
671.	Friedman/Stephenson Analysis of Evidence Photo 40				
672.	Friedman/Stephenson Analysis of Evidence Photo 41				
673.	Friedman/Stephenson Analysis of Evidence Photo 42				
674.	Friedman/Stephenson Analysis of Evidence Photo 43				
675.	Friedman/Stephenson Analysis of Evidence Photo 44				
676.	Friedman/Stephenson Analysis of Evidence Photo 45				
677.	Friedman/Stephenson Analysis of Evidence Photo 46				
678.	Friedman/Stephenson Analysis of Evidence Photo 47				
679.	Friedman/Stephenson Analysis of Evidence Photo 48				
680.	Friedman/Stephenson Analysis of Evidence Photo 49				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
681.	Friedman/Stephenson Analysis of Evidence Photo 50				
682.	Friedman/Stephenson Analysis of Evidence Photo 51				
683.	Friedman/Stephenson Analysis of Evidence Photo 52				
684.	Friedman/Stephenson Analysis of Evidence Photo 53				
685.	Friedman/Stephenson Analysis of Evidence Photo 54				
686.	Friedman/Stephenson Analysis of Evidence Photo 55				
687.	Friedman/Stephenson Analysis of Evidence Photo 56				
688.	Friedman/Stephenson Analysis of Evidence Photo 57				
689.	Friedman/Stephenson Analysis of Evidence Photo 58				
690.	Friedman/Stephenson Analysis of Evidence Photo 59				
691.	Friedman/Stephenson Analysis of Evidence Photo 60				
692.	Friedman/Stephenson Analysis of Evidence Photo 61				
693.	Friedman/Stephenson Analysis of Evidence Photo 62				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
694.	Friedman/Stephenson Analysis of Evidence Photo 63				
695.	Friedman/Stephenson Analysis of Evidence Photo 64				
696.	Friedman/Stephenson Analysis of Evidence Photo 1				
697.	Friedman/Stephenson Analysis of Evidence Photo 2				
698.	Friedman/Stephenson Analysis of Evidence Photo 3				
699.	Friedman/Stephenson Analysis of Evidence Photo 4				
700.	Friedman/Stephenson Analysis of Evidence Photo 5				
701.	Friedman/Stephenson Analysis of Evidence Photo 6				
702.	Friedman/Stephenson Analysis of Evidence Photo 7				
703.	Friedman/Stephenson Analysis of Evidence Photo 8				
704.	Illustration of Toyota parts				
705.	Illustration of Toyota parts				
706.	Illustration of Toyota parts				
707.	Photos of cab interior of Daniel Sprinkle's tractor				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
708.	Cost information for Toyota fuel tank protectors if purchased from parts seller				
709.	February 28, 2011 letter from the Insurance Institute for Highway Safety to National Highway Traffic Safety Administration: Petition for Rulemaking; 49 CFR Part 571 Federal Motor Vehicle Safety Standards; Rear Impact Guards; Rear Impact Protection				
710.	Insurance Institute for Highway Safety News Release: Underride guards on big rigs often fail in crashes; Institute petitions government for new standard				
711.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 46, No. 2, March 1, 2011: Underride Crashes				
712.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 47, No. 5, July 3, 2012: Special Issue: Crash Avoidance				
713.	Insurance Institute for Highway Safety Bulletin Vol. 29, No. 5, April 2012: Volvo collision avoidance features: initial results				
714.	Expert report of Dr. Joseph Burton				
715.	Curriculum Vitae of Dr. Joseph Burton				
716.	Collection of Dr. Burton's Vehicle Inspection Photographs				
717.	Dr. Burton Rear Impact Case list				
718.	Dr. Burton Underride Case list				
719.	Dr. Burton Fuel-fed Fires Cases list				
720.	Dr. Burton Lateral Impact Cases list				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
721.	Dr. Burton Rear Impact Bibliography				
722.	Dr. Burton Fire / CO Bibliography				
723.	Dr. Burton Side Impact Bibliography				
724.	Dr. Burton Underride Bibliography				
725.	Dr. Burton Head Injury Bibliography				
726.	Dr. Burton Human Tolerance Bibliography				
727.	Dr. Burton Pain & Suffering Bibliography				
728.	Dr. Burton Diagnosis of Seat Belt Usage Bibliography				
729.	Dr. Burton Seat Belt Bibliography				
730.	Dr. Burton Forensic Textbook Bibliography				
731.	Papers authored by Dr. Burton				
732.	Dr. Burton's 4Runner inspection notes				
733.	Timeline of critical dates				
734.	Frank Katz email regarding Canadian bumper and cost per unit				
735.	Frank Katz email regarding Canadian bumper				
736.	Frank Katz email with TTMA information				
737.	email regarding TTMA conference on Lufkin verdict				
738.	Demonstrative video – run3-1				
739.	Demonstrative video – run3-2				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
740.	Demonstrative video – run3-3				
741.	R11-21 Toyota 4Runner - Biokinetics report				

Plaintiffs further reserve the right to use any exhibits identified by Defendants in their exhibits lists, as well as rebuttal exhibits whose use may not be known, or reasonably anticipated, at the time of this submission. Plaintiffs also reserve the right to designate additional exhibits, if any to respond to Toyota’s new strategy to blame other former Defendants.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2014, the foregoing document was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Aubrey “Nick” Pittman
AUBREY “NICK” PITTMAN